

CB/JC
25-1345
(Lead)

MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF

COMES NOW, Michael O'Brien, respectfully moving this Honorable Court for leave to file the accompanying *Amicus Curiae* Brief in support of Petitioner Kilmar Abrego Garcia.

As a private citizen with a vested interest in due process and government accountability, and acting independently without organizational affiliation, the undersigned submits that the proposed brief raises constitutional concerns of broad public import. The unlawful deportation of a legally protected individual implicates the Fifth Amendment, judicial authority, and the separation of powers.

The proposed brief also addresses subsequent statements by foreign officials that may further complicate the government's ability to comply with existing judicial orders—an issue meriting clarification and commentary from the public.

WHEREFORE, Amicus respectfully requests that this Court grant leave to file the attached brief.

Respectfully submitted,

/s/ Michael O'Brien

Michael O'Brien

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Pro Se Amicus Curiae

Dated: April 16, 2025

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